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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC.,  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION,

Case No. 19-md-02913-WHO

Hon. William H. Orrick

This Document Relates to:

ALL ACTIONS

**JOINT NOTICE OF FILING OF  
RESPONSE TO ORDER REGARDING  
ADMINISTRATIVE MOTIONS TO SEAL**

1 The undersigned parties hereby submit this Joint Notice of Filing of a joint response  
 2 addressing all material covered by the 58 administrative motions to seal files in connection with  
 3 the *San Francisco Unified School District* bellwether case and trial identified by this Court in its  
 4 September 13, 2024, Order Regarding Administrative Motions To Seal Filed In Connection With  
 5 Motions For Summary Judgment, Motions In Limine, & Motions Re *SFUSD* Trial (ECF No. 4299).

6 Plaintiffs’ Leadership, Plaintiff San Francisco Unified School District (“SFUSD”), and  
 7 Defendant Adam Bowen (“Bowen”) hereby certify that they have not identified any documents  
 8 they request this Court maintain under seal.

9 The remaining parties – Defendants Nicholas Pritzker, Hoyoung Huh, and Riaz Valani  
 10 (collectively, the “Non-Management Director Defendants” or “NMDs”); Defendant Juul Labs, Inc.  
 11 (“JLI”); Defendants Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria  
 12 Enterprises LLC, and Altria Group Distribution Company (collectively, “Altria”), and Defendant  
 13 James Monsees (“Monsees”) – attach hereto as **Exhibit 1** (and submitted to the Court in native  
 14 Excel format via email) a joint chart identifying the documents the party, either individually or  
 15 collectively, respectfully requests this Court maintain under seal, as well as the bases upon which  
 16 the party relies for maintaining the documents’ seal.

17 The parties offer a description of the chart as follows:

- 18 • Column A to **Exhibit 1** identifies the docket number of the administrative motion or  
 19 statement in response filed;
- 20 • Column B to **Exhibit 1** identifies the date of filing of the administrative motion or statement  
 21 in response;
- 22 • Column C to **Exhibit 1** identifies the filing name of the administrative motion or statement  
 23 in response;
- 24 • Column D to **Exhibit 1** identifies the party that filed the administrative motion or statement  
 25 in response;
- 26 • Column E to **Exhibit 1** identifies the documents that are currently filed under seal attached  
 27 to the administrative motion or statement in response in that row, including unredacted  
 28 briefs and exhibits;

- 1 • Column F to **Exhibit 1** identifies the documents Altria respectfully requests this Court  
2 maintain under seal and bases for maintaining such seal;
- 3 • Column G to **Exhibit 1** identifies the documents JLI respectfully requests this Court  
4 maintain under seal and bases for maintaining such seal;
- 5 • Column H to **Exhibit 1** identifies the documents Mr. Monsees respectfully requests this  
6 Court maintain under seal and bases for maintaining such seal;
- 7 • Column I to **Exhibit 1** identifies the documents the NMDs respectfully request this Court  
8 maintain under seal and bases for maintaining such seal; and
- 9 • Column J to **Exhibit 1** identifies the docket location of the sealed information the above-  
10 referenced Parties request remain under seal.

11 Altria, JLI, Mr. Monsees, and the NMDs respectfully request the documents identified in  
12 Columns F through I of **Exhibit 1** remain under seal, for the reasons previously articulated in the  
13 administrative sealing motions, statements in response thereto, and the reasons identified in **Exhibit**  
14 **1**. These Parties further request the entire docket entry identified in Columns F through I to **Exhibit**  
15 **1** remain sealed unless the cell identifies specific pages or lines. The Parties do not object to the  
16 unsealing of any documents subject to the administrative motions not identified in **Exhibit 1**.

17 Attached hereto as **Exhibit 2** is a proposed order **GRANTING** the Parties' request to seal the  
18 documents identified in **Exhibit 1** to this joint notice.

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Dated: January 17, 2025

Respectfully submitted,

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